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2	(admitted pro hac vice)
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6	Eman. ocurus@curus-iawgroup.com
7	IN THE UNITED STATES DISTRICT COURT
8	FOR THE DISTRICT OF ARIZONA
9	IN RE: BARD IVC FILTER PRODUCTS MDL No. 2:15-MD-02641-PHX-DGC
10	LIABILITY LITIGATION
11	This document relates to the cases listed on
12	Exhibit A attached hereto.
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14	STIPULATION OF DISMISSAL WITH PREJUDICE
15	COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto ("Plaintiffs") and
16	
17	Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), file this Stipulation of
18	Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:
19	Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby
20	stipulate to the dismissal of the cases listed on Exhibit A with prejudice to the re-filing of same. Plaintiffs
21	and Defendants further stipulate that they are to bear their own costs.
22	WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request
23	that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same
24	and order that these parties are to bear their own costs.
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3	Respectfully submitted this 7 th day of April 2021.
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5	Respectfully submitted,
6	/~/ W:H: D. Ctin
7	<u>/s/ William B. Curtis</u> William Curtis, Esq.
8	Texas State Bar No. 00783918 CURTIS LAW GROUP
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12	ATTORNEY FOR PLAINTIFF
13	//p: / /p N /
14	<u>/s/ Richard B. North</u> Richard B. North, Jr., GA Bar #545599
15	Nelson Mullins Riley & Scarborogh, LLP
	2017 17 th St. NW, Suite 1700 Atlanta, GA 30363
16	Tel: 404-322-6000
17	Fax: 404-322-6050
18	Richard.north@nelsonmullins.com Attorneys for Defendants
19	·
20	<u>CERTIFICATE OF SERVICE</u>
21	I hereby certify that on this 7 th day of April 2021, I electronically transmitted the attached
22	document to the Clerk's Office using the CM/ECF System which will automatically send email
23	notification of such filing to all attorneys of record.
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25	/s/ William Curtis
	WILLIAM CURTIS
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